

Docket No. LPTF03  
US App. No. 10/502,269

---

## REMARKS

### Status of the Application

Claims 1-3, 5-7, and 9-10 were previously pending. Claim 1 was rejected under 35 USC 112, first paragraph and second paragraph. Claims 1-3, 5-7, and 9-10 were rejected under 35 USC 102(e) as being anticipated by Jones et al. (US 6,438,638).

In response to this Office Action, Applicant has amended claim 1 and canceled claim 5. No new matter or new issue is raised through the amendments. Entry of the amendments is requested. For the reasons discussed below, withdrawal of the rejections is requested.

### Claim Rejections – 35 USC 112, First Paragraph

Claim 1 was rejected under 35 USC 112, first paragraph. More particular, the Office Action indicated that the claim language “said controller does not include any CPU...” added to claim 1 is not supported by the specification.

In response, Applicant has canceled the above language. Thus, the rejection is now moot.

### Claim Rejections – 35 USC 112, Second Paragraph

Claim 1 was rejected under 35 USC 112, second paragraph. More particular, the Office Action indicated that the claim language is not clear enough.

In response, Applicant has modified the claim language to more clearly define the invention. As the amendment only serves to clarify the claim language and does not raise new issue, entry of the amendment is requested.

Withdrawal of the rejection is requested.

### Claim Rejections – 35 USC 102 (e)

Claims 1-3, 5-7, and 9-10 were rejected under 35 USC 102(e) as being anticipated by Jones et al. (US 6,438,638).

Applicant respectfully traverses the rejections for reasons discussed below.

The Office Action indicated that Jones teaches an USB removable memory with replaceable storage medium for optional upgrade and extension of the storage capacity, including an USB

Docket No. LPTF03  
US App. No. 10/502,269

connector, a controller (USB chip, Fig. 10), and a replaceable flash memory (CompactFlash 16).

However, US 6438638 and the present invention are directed to different subject and different type of devices, which leads to notably different technical solutions. US6438638 relates to a reader of a flash memory for reading data from different flash memories, while the present application relates to an USB removable memory for improving conventional USB removable memory itself. A difference is that the USB removable memory of the present invention itself is a memory and must include the replaceable flash memory. However, the reader in the US6438638 can stand alone, it doesn't and needn't include a replaceable flash memory. The reader is used for reading flash memories.

Furthermore, claim 1 in the present application recites that "the replaceable flash memory as a physically-independent storage component is replaceably and directly attached to the memory body, wherein said replaceable flash memory is placed within a chamber of the memory body and the chamber is covered by a dismountable back cover...". The replaceable flash memory is placed in a chamber of the memory body, and the chamber is covered by a cover. The above technical feature is not disclosed in US6438638. The purpose of this connection relationship is to make the flash memory connect to the body stably and firmly and to protect the flash memory from physical damage. The reason is that the connecting status between the flash memory and the memory body in the present invention is normal status which is in need of persisting for a long time as a memory. Because of this characteristic, the memory is different from the card reader. The flash memory does not have to stably and firmly connect with the card reader for a long time, and it is only needed to connect with the card reader by the USB interface when the data is read and written. In contrast, the card reader of US6438638 is designed to read different types of memories, and needs to be connected to and disconnected from a memory card frequently. The connection structure as defined in claim 1 would make the frequent replacement of memory cards very inconvenient and, therefore, is undesirable for a card reader.

For at least the reasons discussed above, applicants respectfully submit that US6438638 cannot anticipate claim 1 of the present application. Claims 2-3, 6-7, and 9-10 depend on claim 1

Docket No. LPTF03  
US App. No. 10/502,269

and, thus, are not anticipated by US6438638 for at least the same reasons discussed above.

In addition, these dependent claims contain features that further distinguish over US6438638. For example, claim 9 recites that "said back cover is mounted on the body by means of guide channel or clasp", this feature is not disclosed in US6438638.

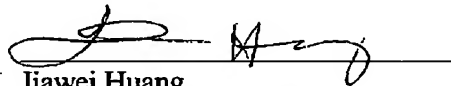
#### Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the remaining claims 1-3, 6-7, and 9-10 are now in condition for allowance. Allowance of this application is earnestly solicited.

Respectively submitted

J.C. PATENTS

Date: 4-17-2008

  
Jiawei Huang  
Registration No. 43,330

4 Venture, Suite 250  
Irvine, CA 92618  
Tel.: (949) 660-0761